

REMARKS

This communication is responsive to the Office Action mailed April 6, 2006 and filed with an RCE included herewith.

The Office Action first reports that claims 1, 26 and 34 and some dependent claims depending therefrom were rejected as under 35 U.S.C. 112, first paragraph, for reciting claim language, which was understood to imply that the first client device and the second client device were operated by the same user, although the first client device and the second client device are remote from each other. Simultaneous operation of two client devices remote from each other, was not intended by the claim language used, nor is it intended to claim the users of the devices. Recitation of "users" is used only in the context of the type of interface used by each of the devices and the manner in which input by the user is provided. It is believed the language now provided in claims 1, 26 and 34 has corrected the claim language. Claim 36 has also been amended in a manner to delete recitation of the user. In view of the foregoing, withdrawal of the rejection is requested.

The Office Action reports that claim 1 was rejected as being obvious over Barclay (U.S. 5,960,399) in view of Brown (U.S. 6,587,822).

Barclay is cited for disclosing a server/client system for processing speech data comprising a web server, a client device and a recognition server, but it is acknowledged that Barclay does not disclose a second client device configured to record speech data and adapted to send speech data to the recognition server, wherein the second client device comprises a telephone and a voice browser. Brown is cited for disclosing such a device.

Applicant respectfully disagrees that the cited combination of Barclay and Brown teach the invention recited by

claim 1 as herein amended. Brown teaches a web-based IVR platform 102 adapted to receive input from a user using a device 108 that can be a telephone in order to access and render websites from servers 106-1 through 106-N. The web-based IVR platform 102 includes a speech recognizer 122 for performing speech recognition from the user and a text-to-speech synthesizer 116 used to render the website pages audibly to the user through the device 108. The device 108 is connected to the web-based IVR platform 102 through network 109, while the web-based IVR platform 102 is connected to servers 106-1 - 106-N through network 104. Brown appears very similar to the VoiceXML discussed in the Background Section of the application.

In response to Applicant's arguments provided in the last response that the cited combination of references do not teach or suggest a speech recognition server configured to support two different types of client devices, the Office Action reports Barclay's web server is available over the Internet and that Barclay discloses the first client device (figure 4, 70). Brown is cited for disclosing the second client device (figure 1, 108). The Office Action reports that these elements meet the claim language in view of the wording that the speech recognizer returns data "indicative of what was recognized based on a grammar to at least one of the client devices providing the input data and the web server." Applicant has amended claim 1 to clarify clearly that the speech recognizer is configured to support both of the client devices and provide recognition results back either to the web server or the client device providing the input speech.

In this manner, a single recognition server can support both devices even though the devices are different. As recited in amended claim 1, the first client device provides visual rendering, while the second client device provides audible rendering. Barclay and Brown taken alone or in combination do not

teach the system of claim 1. Barclay simply lacks a second client device with the features of claim 1. However, Brown describes a system where the web-based IVR platform 102 includes both a browser 110 and a speech recognizer 122 (see FIG. 2 and column 3, lines 29-34 of Brown). Moreover, the web-based platform 102 communicates with the audio device 108 by receiving audible speech/DTMF and returning audible speech/audio playback. Neither Barclay nor Brown teach alone or in combination a speech recognizer for receiving speech from a visually rendering client device in addition to the audible only device 108. Therefore, the combination of Barclay and Brown would necessitate a system with two recognizers, each recognizer serving a different type of client device.

In view of the foregoing, amended claim 1 is believed allowable. Dependent claims 8, 9 and 14-25 depend directly or indirectly from claim 1 and are believed separately patentable.

Claim 26 was also rejected based on the combination of Barclay and Brown. Claim 26 has been amended in a manner similar to claim 1; however, the input data from the device is not limited to speech data. Nevertheless, the reasons provided above for allowance of claim 1 are applicable to claim 26 and are herein incorporated by reference. Accordingly, claim 26 is believed allowable and dependent claims 27-30 are believed separately patentable, and thus, also allowable.

Likewise, for the reasons discussed with respect to amended claims 1 and 26, amended claim 34, which recites a method for processing input data in a client/server system, is believed allowable, while dependent claims 36-39 are believed separately patentable and allowable.

An extension of time is hereby requested for consideration of this Amendment. A charge authorization is included herewith for the extension of time fee.

In view of the foregoing, reconsideration of the application as amended is requested. Favorable action upon all pending claims is solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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